

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT 47963
for Ames Diversified Services**

I. INTRODUCTION

This Class II air quality control permit is for the operation of an animal crematory facility. The facility is owned and operated by Ames Diversified Services in Cochise County. The facility is currently operating under Class II Permit Number 36821. The facility is relocating from 2017 Rogers Avenue, Douglas, AZ 85607, to 6944 Runway Road, Douglas, AZ 85607. This relocation necessitates a new permit.

Company Information

Company Name:	Ames Diversified Services, LLC
Facility Name:	Bisbee-Douglas Airport Facility
Facility Address:	6944 Runway Road Douglas, Cochise County, AZ 85607
Mailing Address:	Same As Above

Background

This source is an animal hospital and cremation facility, located in Douglas, Arizona, which operates 3 cremators with a combined capacity of 530 lb/hr. The original permit was issued in May 1992.

II. FACILITY DESCRIPTION

Process Description

The facility provides animal cremation services. Approximately 2,320 tons are cremated each year. The facility operates 12 hours per day, 7 days per week (note that this is a maximum – the cremators are not necessarily operating this entire time).

III. EMISSIONS

The cremators burn natural gas. The potential to emit, without controls, of regulated pollutants is less than the significance levels for all criteria pollutants. However, the cremators have a capacity of more than 1 million Btu/hr, and have the potential to be fired for more than an 8 hour period, so a permit is required under R18-2-302.B.2.a.v.

IV. APPLICABLE REGULATIONS

The applicable regulations were identified by the applicant as part of the application packet. Table 1 displays the applicable requirements for each piece of equipment under this proposed permit.

Table 1: Verification of Applicable Regulations

Unit	Date of Constr. /Mod.	Control Device	Rule	Verification
Incinerator for Animal Remains	1998 & 2005	None	A.A.C. R18-2-704 & -904	904 incorporates 40 CFR §60.52-54 and 704.A as applicable to incinerators less than 50 tons per day capacity.

Previous Permit Conditions

Class II Operating Permit Number 36821 was issued to Ames Diversified Services on April 19, 2006, to operate the Animal Health Care Center. This permitting action results from the relocation of the facility. Table 2, below, shows each condition of the previous permit, and lists whether that condition was revised, kept the same, or deleted.

Table 2: Previous Permit Conditions

Condition #	Determination			Comments
	Revise	Keep	Delete	
Att. A	X			General Provisions - Revised to represent most recent permitting language
Att. B.I		X		No change
Att. B.II	X			Revised testing requirements
Att. B.III	X			Updated to reflect most recent permitting language
Att. B.IV		X		No change

V. MONITORING AND RECORDKEEPING REQUIREMENTS

Monitoring Requirements

A certified EPA Reference Method 9 observer is required to perform a monthly survey of visible emissions from the cremator stacks. If the opacity of the emissions appears to exceed the standard, the Permittee is required to conduct a certified Method 9 observation.

Recordkeeping Requirements

The Permittee is required to record the daily charge rates and hours of operation.

Previous Permits

Permit No.	Permit Type
36821	Class II Air Quality Permit

VI. AMBIENT AIR IMPACT ANALYSIS

The applicant performed Screen3 modeling for the facility. The modeling was performed at 8,760 hours per year. No exceedances of any applicable standards were predicted. The permit contains a voluntarily accepted condition limiting the facility to 12 hours per day and 4,380 hours per year, which will provide further assurance that no exceedances will occur.

VII. IMPACT ON LEARNING SITES

A search of the ADEQ database found no learning sites within two miles of this facility.

VIII. COMPLIANCE HISTORY

There have been eight inspections at this facility. There are no air quality cases or alleged violations associated with this facility within the last five years.